

## Worksheet for Technical Review of Working Draft of Proposed Permit

<b>Company Name:</b>	MB Industries, LLC	<b>AI #:</b>	38748	<b>TEMPO Activity No:</b>	20090001
<b>Facility Name:</b>	MBL- Shreveport Facility	<b>Remarks Submitted by:</b>	Steven Lee		
<b>Permit Writer:</b>	Corey Gautreaux	<b>Permit Writer Email address:</b>	Corey.Gautreaux@la.gov		

### Instructions

**Permit Reference** – Indicate specific portion(s) of the permit to which the remark relates (i.e. “Specific Condition 120”, or “Section II Air Permit Briefing Sheet”, etc.).

**Remarks** – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information *must be submitted*. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note:* New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

**DEQ Response** – *DO NOT COMPLETE THIS SECTION*. This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during the public comment period.

- Additional rows may be added as necessary.
- Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Agency Interest No.	MB Industries, LLC previously requested that the Department assign a new and unique Agency Interest (AI) number to the facility at 601 Benton Kelly Street in Shreveport, Louisiana. MB Industries, LLC has no association with the former operator or operations at the facility.	Agency Interest (AI) numbers are assigned to facilities, not to individual companies. The AI number has no association with the previous facility. Therefore, the AI number will remain 38748.
Section III. Description; Air Permit Briefing Sheet, (**) Operational Flexibility comments.	MB Industries, LLC requests that the notes concerning operational flexibility below the TAPs summary table to read:  ** For operational flexibility, use any material containing a TAP listed in Table 51.1, 51.2, or 51.3 shall be permitted provided that its use does not cause total VOC emissions attributed to GRP0006 to exceed Total TAPs of 24.75 TPY and total VOCs of 95.00 TPY in any 12 consecutive month period. Emissions of any TAP not listed in GRP0006 shall be limited to the Minimum Emission Rate (MER) for that TAP listed in Table 51.1 and 51.2 of LAC 33:III.5112.	TAP flexibility was added in accordance to DEQ's standard procedures.
Section IV. Type of Review	MB Industries, LLC requests that the type of permit be a Synthetic Minor and the last sentence in Section IV to read as follows: <i>This facility is a synthetic minor source of LAC 33:III.Chapter 51 Toxic Air Pollutants (TAPs).</i>	Changes made

Section V. Public Notice	Information to be updated upon closure of public comment period.	Changes will be made after public comment.
<p><b>ARE 0009 16 - Bay 14</b>  Paint Area, Specific Conditions 3, 4, 5, 6, 7, 8, 9, 10, and 11.</p>	<p>MB Industries, LLC (MBI) requests that either these specific conditions be removed from the permit or are supported with a qualifying statement, such as: "<i>if applicable</i>". MB Industries, LLC does not now nor do they intend to utilize paints which contain MFHAP as defined in 40 CFR 63.11514(b)(4), which states: "<i>A spray painting affected source is the collection of all equipment and activities necessary to perform spray applied painting operations using paints which contain MFHAP</i>". Therefore, based on the proposed emissions and intended operations at the facility, this requirement is not applicable to MBI operations.</p>	<p>Scenario #1 was created to ensure the facility follows all applicable Subpart XXXXXX requirements should the facility utilize paints containing MFHAP. All requirements for ARE 0009 are now listed in GRP 0006.</p>
<p><b>EOT 0029 07</b>  Pangborn Shot Dust Collector, Specific Condition 36.</p>	<p>MB Industries, LLC requests that the phrase: "(Complies by using sweet natural gas as a fuel)" be removed from Specific Condition 36, as the dust collector does not use natural gas as a fuel.</p>	<p>Changes made</p>
<p><b>EOT 0029 08</b>  Wheelabrator Shot Dust Collector, Specific Condition 42.</p>	<p>MB Industries, LLC requests that the phrase: "(Complies by using sweet natural gas as a fuel)" be removed from Specific Condition 42, as the dust collector does not use natural gas as a fuel.</p>	<p>Changes made</p>
<p><b>EOT 0031 10</b> Sand Delivery to Silo, Specific Condition 47.</p>	<p>MB Industries, LLC requests that the phrase: "(Complies by using sweet natural gas as a fuel)" be removed from Specific Condition 47, as the sand transfer operations do not use natural gas as a fuel.</p>	<p>Changes made</p>
<p><b>FUG 0005 09</b> Shot Blasting Fugitives, Specific Condition 52.</p>	<p>MB Industries, LLC requests that the phrase: "(Complies by using sweet natural gas as a fuel)" be removed from Specific Condition 52, as the shot blasting operations do not use natural gas as a fuel.</p>	<p>Changes made</p>
<p><b>FUG 0006 11</b> Sand Blasting Fugitives, Specific Condition 65.</p>	<p>MB Industries, LLC requests that the phrase: "(Complies by using sweet natural gas as a fuel)" be removed from Specific Condition 65, as the sand blasting operations do not use natural gas as a fuel.</p>	<p>Changes made</p>
<p><b>GRP 0006 – Surface Coating of Metal Products (CAP).</b>  Specific Conditions 75, 76, 77, 78, 79, 80, 81, 82, and 83.</p>	<p>MB Industries, LLC (MBI) requests that either these specific conditions be removed from the permit or are supported with a qualifying statement, such as: "<i>if applicable</i>". MB Industries, LLC does not now nor do they intend to utilize paints which contain MFHAP as defined in 40 CFR 63.11514(b)(4), which states: "<i>A spray painting affected source is the collection of all equipment and activities necessary to perform spray applied painting operations using paints which contain MFHAP</i>". Therefore, based on the proposed emissions and intended operations at the facility, this requirement is not applicable to MBI operations.</p>	<p>Scenario #1 was created to ensure the facility follows all applicable Subpart XXXXXX requirements should the facility utilize paints containing MFHAP.</p>